Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Full Compliance Evaluation

Bristol Bay Fuels – Dillingham Terminal
Dillingham, Alaska

Inspection Date: August 15, 2022

JON KLEMESRUD Digitally signed by JON KLEMESRUD
Date: 2022.10.19 14:58:06 -07'00'

Report Author Signature Date

Jon Klemesrud
Enforcement & Compliance Assurance Division
EPA Region 10

JOHN PAVITT Digitally signed by JOHN PAVITT
Date: 2022.10.19 16:01:38 -08'00'

Peer Review Signature Date

John Pavitt
Enforcement & Compliance Assurance Division
EPA Region 10

DERRICK TERADA Digitally signed by DERRICK TERADA
Date: 2022.10.20 09:37:51 -07'00'

Section Chief Signature Date

Derrick Terada
Acting Supervisor, Air & Toxics Enforcement Section
Enforcement & Compliance Assurance Division
EPA Region 10

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Attachments

1. Facility Information

Facility:	Bristol Alliance Fuels, LLC. – Dillingham dba Bristol Bay Fuels – Dillingham Terminal
Facility Owner:	Bristol Bay Industrial, LLC Bristol Bay Native Corporation
Physical Address:	109 North Pacific Court Dillingham, Alaska 99576
Mailing Address:	5015 Business Park Blvd., Suite 4000 Anchorage, Alaska 99503
AFS/FRS Number:	110070836917
SIC:	5171 (Petroleum Bulk Stations and Terminals)
NAICS:	424710 (Petroleum Bulk Stations and Terminals)
ADEC Air Permit Number:	AQ1578PL101
Facility Contacts:	Lewis Byrne Director of Fuels & Terminals Bristol Bay Fuels lewisb@bristolbayfuels.com (907) 252-7625 Joe LoSciuto Bristol Bay Fuels joe.losciuto@bbindustrial.com (907) 865-5550

2. Inspection Information

Date of Inspection:	August 15, 2022
Inspection Start/End Times:	9:00am – 11:55am
U.S. EPA Inspector:	Jon Klemesrud, Inspector Field, Data and Drinking Water Enforcement Section (FDDWES) Enforcement and Compliance Assurance Division (ECAD) U.S. EPA Region 10
Alaska DEC Inspector:	Samantha Hoover Air Compliance Program Alaska Department of Environmental Conservation

Inspection Notice: This was an announced inspection. Notification was provided via email on August 5, 2022.

Disclaimer:
Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Lewis Byrne or from observations made during the inspection and/or file review. The report is a summary of observations and information gathered, it does not constitute a final decision regarding compliance with CAA regulations or applicable permits, nor is it meant to be a comprehensive summary of all activities and processes conducted at the facility.

This was a full compliance evaluation (FCE) by the U.S. Environmental Protection Agency Region 10 (EPA R10) and the Alaska Department of Environmental Conservation (ADEC). EPA R10 led the inspection. The purpose of the inspection was to identify potential compliance concerns with Federal Clean Air Act (CAA) regulations for Bulk Gasoline Plants and Terminals, specifically to gather information in order to determine if facility is subject to and in compliance with the following federal air rules:

- 40 CFR Part 60 New Source Performance Standards (NSPS)
  - Subpart Kb (Standards for Volatile Organic Liquid Storage Tanks)
  - Subpart XX (Standards for Bulk Gasoline Terminals)

- Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP)
  - Subpart BBBBBB (Standards for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.
  - Subpart CCCCCC (Standards for Gasoline Dispensing Facilities)

3. Facility Background

Bristol Alliance Fuels, LLC dba Bristol Bay Fuels – Dillingham (hereinafter referred to as the "Facility") is a wholly owned subsidiary of Bristol Bay Industrial, LLC, a holding company of Bristol Bay Native Corporation. According to the company's website (bristolbayfuels.com), the Facility is a regional supplier of fuel products, fuel services, and delivery to Western Alaska. The Facility stores diesel, heating fuel, aviation and unleaded gasoline, and jet-A fuel. Product is received by marine delivery, stored at the tank farm, and distributed at the Facility's loading rack to a fleet of tanker trucks owned by the Facility. On occasion, the Facility will also distribute to bulk cargo and fishing vessels at the Facility bulkhead. The Facility meets the definition of a bulk gasoline plant (as defined in Part 63 NESHAP Subpart BBBBBB) as gasoline throughput is less than 20,000 gallons per day.

The Facility is located in Dillingham, Alaska, approximately 400 feet east of the entrance to the Dillingham small boat harbor and 450 feet north of the Nushagak River. Bristol Alliance Fuels, LLC is headquartered in Anchorage, Alaska. For a general footprint and location, an aerial image from Google Earth® is attached to this report as **Attachment A.**

The Facility operates under an approved Pre-Approved Emission Limit (PAEL) issued in 2019 by ADEC's Air Quality Program for throughput or transfer of less than 19,900 gallons of

gasoline per day (**Attachment B**). The permit number associated with the PAEL is #AQ1578PL101.

4. Compliance History

According to EPA's Enforcement Compliance History Online (ECHO[1]), the Facility was last evaluated for compliance by ADEC via an off-site partial compliance evaluation (PCE) on February 18, 2022. Based upon my review of compliance data and communications with ADEC, an off-site PCE occurs annually to confirm compliance with ADEC's PAEL requirements [18 AAC 50.230(D)(2)(A, B, and D)]. No enforcement actions or non-compliance had been documented.

5. Inspection Chronology

The inspection was completed in conjunction with a separate inspection of a second Bristol Alliance Fuels, LLC facility, the Bristol Bay Fuels – Dillingham Downtown Terminal (AQ1579PL101). Following this inspection, I proceeded to inspect the Dillingham Downtown Terminal location. Those inspection findings are documented in a separate report.

This inspection was announced on August 5, 2022. I emailed Mr. Joseph LoSciuto, President of Bristol Alliance Fuels LLC and explained that I had been asked to conduct a routine inspection at the Facility to assess compliance with CAA regulations and associated ADEC PAEL. Within my email, I also included an EPA brochure that summarizes the requirements of Part 63 NESHAP Subpart BBBBBB. I discussed that a representative of ADEC would be accompanying me on the inspection.

On August 8, 2022, I received a call from Mr. Lewis Byrne, Director of Fuels and Terminals. Mr. Byrne is the on-site manager at the Facility and had received my message via Mr. LoSciuto. Mr. Byrne welcomed the inspection, we agreed on the inspection date/time and briefly discussed safety precautions in advance of the on-site visit.

On the day of the inspection, Samantha Hoover (ADEC) and I arrived at the Facility and met with Mr. Byrne to begin the inspection. The inspection included an opening conference, a records review, a facility walk-through, and a closing conference.

The on-site records review occurred within Mr. Byrne's office, just prior to the facility walk-through. Portions of the records review also occurred pre- and post-inspection as discussed in this inspection report. For the facility walk-through, we observed general operations, the fuel truck fleet, the tank farm, and the truck and marine loading racks. Mr. Byrne accompanied us throughout the inspection, and we are allowed to inspect all areas requested.

[1] See https://echo.epa.gov/

6. Opening Conference

The opening conference was held within Mr. Byrne's office. We had our initial introductions, exchanged business cards, I presented my inspector credentials and Ms. Hoover presented her ADEC identification.

I discussed the purpose and expectations of the inspections and provided Mr. Byrne with a copy of the EPA Small Business Resource Information Sheet as well as printed versions of the EPA handouts on Part 63 NESHAP Subpart BBBBBB and Subpart CCCCCC. I also discussed that I would be taking photographs during the walk-through as well as video recordings using EPA's FLIR GF320 gas detection camera.

7. Records Review

A records review was conducted as part of this inspection. I reviewed records to document compliance with Part 63 NESHAP Subpart BBBBBB, Subpart CCCCCC and the 2019 Pre-Approved Emission Limit (PAEL) issued by ADEC for throughput or transfer of less than 19,900 gallons of gasoline per day.

Annual Gasoline Throughput Documentation:

Under the PAEL, ADEC requires the Facility to submit documentation annually of their daily gasoline throughput. Throughput records are due to ADEC in the form of a Fuel Usage Report by January 31 of each year by electronic submission.

Prior to the inspection, in coordination with ADEC, I reviewed Fuel Usage Reports that were submitted to ADEC for 2019, 2020 and 2021. The Facility reported below the PAEL of 19,900 gallons for each day of the calendar years. A copy of the 2021 Fuel Usage Report is attached to this inspection report as **Attachment C**.

At the time of inspection, I requested throughput documentation for 2022 to date. Mr. Byrne was able to provide daily throughput records the following day via email. The Facility had reported below the PAEL of 19,900 gallons for each day of the calendar year in 2022.

Monthly Leak Inspection Documentation:

As the Facility meets the definition of a bulk gasoline plant (gasoline throughput is less than 20,000 gallons per day, defined in Part 63 NESHAP Subpart BBBBBB), §63.11089 of the NESHAP requires each owner/operator to perform a monthly leak inspection of all equipment in gasoline service.

At the time of inspection, Mr. Byrne provided me with a logbook/binder documenting weekly inspections of the "Storage Tank / Tank Farm Secondary Containment Area" as well as a monthly "Visual Inspection – Monthly Checklist." Inspections are conducted by Mr. Byrne utilizing a checklist and documentation form. The completed checklists/forms are kept in a binder in his office, records were complete and well organized. Examples of the completed

documentation are attached to this inspection report as **Attachment D**, 7/31/22 Monthly Checklist and 6/3/22 Weekly Inspection Form.

8. Facility Walk-Through

Following our opening conference and records review, Mr. Byrne led us on a tour of the Facility. Photographs used in the inspection report and complete photo log appears in **Attachment E**. Videos taken during the inspection using the FLIR GF320 gas detection camera are documented in a video log attached to this report as **Attachment F**.

The Facility was in operation at the time of the walk-through, Mr. Byrne stated that daily throughput is generally less than 3,000 gallons per day. Throughput is typically higher during summer months attributed to the local fishing season.

We started the tour outside at the Facility's truck loading rack. The truck rack is used to fill the facility's fleet of fuel trucks for transport to customers in the service area. The Facility's fleet includes approximately 12 vehicles. Gasoline as well as other products are dispensed at the truck loading rack using individual drop tube/downspouts for transfer of product into the truck's fuel tank. The truck loading rack has containment curbing around the perimeter as well as spill kit supplies. The truck loading rack is not equipped with a vapor recovery system.

At the time of inspection, one of the Facility's fuel trucks was in the process of being filled with Jet-A Fuel via a drop tube/downspout from above the tank (**Photo 1 & Photo 2**). The drop tube/downspout was inserted into the bottom of the tank for submerged filling. Fueling is operated by the driver of the truck.

We then toured the Facility's pump room (**Photo 3**); within the pump room a series pumps are used to supply fuel from the tank farm to the truck loading rack. Using the FLIR GF320 gas detection camera, no vapors/leaks were observed from the equipments gaskets/seals within the pump room (**Video 1**).

We continued the tour to the Facility's tank farm (**Photo 4**). The tank farm was constructed with the Facility in 1996. The tank farm is diked and lined, there are eight vertical storage tanks: four 321,000-gallon tanks and four 414,000-gallon tanks. The tanks are welded steel with float type product level gauges, water draws, manholes, ladders and connecting bridges/walkways. Tank roofs are weak-seamed for emergency venting. According to Mr. Byrne, the tanks do not contain internal floating roofs. See below for tank number and associated product information:

Tank #1	Aviation Gasoline
Tank #2	Gasoline (Regular Unleaded)
Tank #3	#2 Diesel / Fuel Oil
Tank #4	Gasoline (Regular Unleaded)
Tank #5	Jet-A Fuel
Tank #6	#1 Fuel Oil / Jet
Tank #7	#1 Fuel Oil / Jet
Tank #8	#1 Fuel Oil / Jet

At the time of inspection, Mr. Byrne stated that Tank #2 and Tank #6 were considered "empty" with just a trace amount of product as indicated on each tank gauge (**Photo 5**). We first toured the tank farm from ground level, observing the gasket/seals (**Photo 6 & Photo 7**), each gasket/seal appeared to be in working order. I also observed the gaskets/seals on each tank using the FLIR GF320 gas detection camera, no vapors or leaks were observed (**Video 2 – Video 5**). According to Mr. Byrne these gasket/seals are routinely checked as part of daily operations and are also on a replacement/maintenance schedule. Mr. Byrne stated that typically brownish staining or a sheen below is indicative of a minor leak. As indicated earlier in this report, routine Facility inspections are documented on weekly and monthly checklists (**Attachment D**).

We then observed the top of the tanks via the connecting bridges/walkway above, this included observing pressure relief valves (**Photo 8 & Photo 9**) and vents. Pressure relief valves were installed on Tanks #1, #2, #4, #5, placards indicated that the valves were manufactured by Whessoe Varec, Inc. Each placard also included an identifying serial number. Tanks #3, #6, #7, #8 were not equipped with a pressure relief valve but what appeared to be a curved vent. Looking at the top of the tanks with the naked eye, I did not see any vapors. However, using the FLIR GF320 gas detection camera, vapors were observed coming from the vent/valve in each tank except for Tank #5 and Tank #7 (**Video 6 – Video 13**). Using the camera's view finder, Mr. Byrne also viewed select vent/valves. Mr. Byrne was not aware of the valve's current pressure release setting or any recent calibration and/or service. It was discussed that venting at Bulk Plants is not prohibited under Part 63 NESHAP Subpart BBBBBB.

After viewing each tank from above, we exited the tank farm and followed the marine service lines (**Photo 10**) from the tank farm in a southerly direction toward the marine loading rack. The marine service lines are located just east of the truck loading rack viewed earlier (**Photo 11**). We toured the marine cargo input location used to supply the Facility with product via barge (**Photo 12**), and then viewed the marine loading rack (**Photo 13**). The marine loading rack is used to provide fuel to the marine fishing vessels during the summer months/fishing season. Using the FLIR GF320 gas detection camera, no vapors/leaks were observed from the marine loading rack equipment (**Video 14**). We continued the tour by observing some of the vehicles used in the Facility's fleet (**Photo 14 & Photo 15**). According to Mr. Byrne, a few of the vehicles/tanks are equipped with bottom fueling equipment but that the equipment isn't used due to the fueling equipment at the truck loading rack. We concluded the tour back at the truck loading rack to further observe the drop tube/downspout equipment (**Photo 16**).

9. Closing Conference

Following the facility tour I held a closing conference with Mr. Byrne. We discussed my observations related to the CAA. I explained that I would have to discuss the observed tank fueling procedures at the truck loading rack with some EPA counterparts and compare against the CAA requirements within Part 63 NESHAP Subpart CCCCCC. I informed Mr. Byrne that I would let him know if any potential compliance concerns were identified post-inspection after my review. I also discussed the I would create a shared OneDrive folder to provide Mr. Byrne access to electronic video files taken during the on-site inspection.

10. Post Inspection Activities

On August 16, 2022, as requested during the inspection Mr. Byrne emailed me throughput records for 2022 to date. We also had a follow-up phone conversation on August 16, 2022, confirming receipt of the throughput records. During our phone conversation, I also offered to follow-up with an email to Mr. Byrne assisting him with communicating the previous days inspection activities in advance of the inspection report. Both correspondences are attached to this inspection report as **Attachment G**.

On August 17, 2022, I called Mr. Byrne and discussed that I further reviewed Part 63 NESHAP Subpart CCCCCC to compare against the Facility's fueling procedures observed at the truck loading rack and that I had identified no potential compliance concerns from that part of the Facility.

11. Potential Compliance Concerns

The purpose of the inspection was to identify potential compliance concerns with Federal Clean Air Act (CAA) regulations for Bulk Gasoline Plants and Terminals, specifically to gather information in order to determine if facility is subject to and in compliance with the following federal air rules:

- 40 CFR Part 60 New Source Performance Standards (NSPS)
    - Subpart Kb (Standards for Volatile Organic Liquid Storage Tanks)
    - Subpart XX (Standards for Bulk Gasoline Terminals)

- Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP)
    - Subpart BBBBBB (Standards for Gasoline Distribution Bulk Terminals, Bulk Plants, and Pipeline Facilities.
    - Subpart CCCCCC (Standards for Gasoline Dispensing Facilities)

No potential compliance concerns were identified as part of this inspection.

ATTACHMENT A

Aerial Image
(Google Earth)

ATTACHMENT B

Approved PAEL #AQ1578PL101 ADEC Acknowledgment Letter

THE STATE of ALASKA
GOVERNOR MICHAEL J. DUNLEAVY

Department of Environmental Conservation

DIVISION OF AIR QUALITY
Air Compliance Program

P.O. Box 111800
Juneau, Alaska 99811-1800
Main: 907.465.5100
Toll free: 866.241.2805
Fax: 907.465.5129
www.dec.alaska.gov

CERTIFIED MAIL: 7018 2290 0001 8578 6051
Return Receipt Requested

May 23, 2019

Bob Cox, President and CEO
Bristol Alliance Fuels, LLC
5015 Business Park Blvd, Suite 4000
Anchorage, AK 99503

Subject: Acknowledgment of Pre-Approved Emission Limits, Permit and Files Nos. Listed Below

Dear Mr. Cox:

On May 14, 2019, the Department received your certified request for three (3) Pre-Approved Emission Limits (PAELs) for throughput or transfer of less than 19,900 gallons of gasoline per day for Bristol Alliance Fuels, LLC, Permit and File Nos. listed in Table A below.

Table A – Approved PAELs

Source Name	Permit Number	File Number
BAF Dillingham	AQ1578PL101	PAL 1578
BAF Dillingham Downtown Terminal	AQ1579PL101	PAL 1579
BAF Naknek Terminal	AQ1580PL101	PAL 1580

Based on the supplied information, your certified signature, and receipt of administrative fees, the Department acknowledges that the PAELs listed in Table A became effective on May 15, 2019. The limit remains in effect until terminated in accordance with 18 AAC 50.230(e) or until replaced with an Air Quality Control Permit or letter of owner requested limit (ORL) authorization in accordance with 18 AAC 50.230(e).

Please note that daily gasoline throughput records are due annually on January 31 by electronic submission in accordance with 18 AAC 50.230(d)(2)(D)(ii). Forms designed to assist you with these annual reporting requirements are available under the "ORL & PAEL Forms" section on our website: http://dec.alaska.gov/air/.

If you have any questions regarding this letter, please contact Hunter Mallinger at (907) 465-5103 or by email at hunter.mallinger@alaska.gov.

Sincerely,

Hunter Mallinger
Environmental Program Specialist I, Juneau

cc: Jason Olds, ADEC/ACP, Juneau
P. Moses Coss, ADEC/ACP, Fairbanks
Tom Turner, ADEC/ACP, Anchorage

G:\AQ\PERMITS\AIRFACS\Bristol Alliance Fuels, LLC\Bristol Alliance Fuels PLI Acknowledgement Ltr 051619.docx

ATTACHMENT C

2021 Fuel Usage Report

Department of Environmental Conservation
Air Quality Division

Report Type: PL1 Fuel Usage Report

Permit Details

Organization: Bristol Alliance Fuels LLC
Stationary Source: BAF Dillingham
Permit ID: AQ1578PL101P
Permit Type: Pre-Approved Emission Limit - Gasoline Bulk Storage (PL1)
Report ID: 17029947

Submittal Information

Report Date: 1/21/2022
Submitted/Postmark Date: 1/21/2022
Received Date: 1/21/2022
Received Via: Web
Certified/Submitted By: Joseph LoSciuto

Scheduled Reports

Due Date: 1/31/2022
Period Start Date: 1/1/2021
Period End Date: 12/31/2021

Review Detail

Review Completed Date:
Reviewer Name: Ed Kulack
Reviewer Finding:

PL1 Fuel Usage - Details

PL1 Fuel Usage (reported in full gallons), for the year 2021

January

Sun	Mon	Tue	Wed	Thu	Fri	Sat
–	–	–	–	–	1/1/21 0	1/2/21 0
1/3/21 0	1/4/21 0	1/5/21 0	1/6/21 0	1/7/21 8271	1/8/21 0	1/9/21 0
1/10/21 0	1/11/21 304	1/12/21 287	1/13/21 0	1/14/21 225	1/15/21 133	1/16/21 5400
1/17/21 0	1/18/21 0	1/19/21 0	1/20/21 0	1/21/21 0	1/22/21 101	1/23/21 0
1/24/21 0	1/25/21 3000	1/26/21 307	1/27/21 2900	1/28/21 1402	1/29/21 107	1/30/21 0
1/31/21 0						

February

Sun	Mon	Tue	Wed	Thu	Fri	Sat
_	2/1/21 0	2/2/21 0	2/3/21 0	2/4/21 0	2/5/21 32	2/6/21 0
2/7/21 0	2/8/21 3001	2/9/21 71	2/10/21 0	2/11/21 0	2/12/21 0	2/13/21 0
2/14/21 0	2/15/21 0	2/16/21 0	2/17/21 3000	2/18/21 0	2/19/21 96	2/20/21 0
2/21/21 0	2/22/21 4260	2/23/21 176	2/24/21 4492	2/25/21 222	2/26/21 196	2/27/21 0
2/28/21 2319						

March

Sun	Mon	Tue	Wed	Thu	Fri	Sat
_	3/1/21 0	3/2/21 0	3/3/21 0	3/4/21 0	3/5/21 0	3/6/21 0
3/7/21 0	3/8/21 5436	3/9/21 0	3/10/21 259	3/11/21 0	3/12/21 0	3/13/21 0
3/14/21 3000	3/15/21 0	3/16/21 0	3/17/21 0	3/18/21 158	3/19/21 0	3/20/21 0
3/21/21 0	3/22/21 0	3/23/21 6001	3/24/21 0	3/25/21 101	3/26/21 0	3/27/21 0
3/28/21 0	3/29/21 4891	3/30/21 1112	3/31/21 0			

April

Sun	Mon	Tue	Wed	Thu	Fri	Sat
_	_	_	_	4/1/21 0	4/2/21 0	4/3/21 0
4/4/21 0	4/5/21 3000	4/6/21 25	4/7/21 0	4/8/21 3017	4/9/21 0	4/10/21 0
4/11/21 0	4/12/21 0	4/13/21 0	4/14/21 275	4/15/21 52	4/16/21 0	4/17/21 3662
4/18/21 0	4/19/21 0	4/20/21 15	4/21/21 999	4/22/21 2300	4/23/21 33	4/24/21 1500
4/25/21 0	4/26/21 229	4/27/21 0	4/28/21 0	4/29/21 1349	4/30/21 0	

May

Sun	Mon	Tue	Wed	Thu	Fri	Sat
–	–	–	–	–	–	5/1/21 0
5/2/21 0	5/3/21 0	5/4/21 0	5/5/21 340	5/6/21 110	5/7/21 15	5/8/21 928
5/9/21 0	5/10/21 0	5/11/21 0	5/12/21 369	5/13/21 2267	5/14/21 2800	5/15/21 0
5/16/21 0	5/17/21 121	5/18/21 456	5/19/21 0	5/20/21 0	5/21/21 237	5/22/21 3860
5/23/21 0	5/24/21 419	5/25/21 834	5/26/21 1500	5/27/21 155	5/28/21 0	5/29/21 0
5/30/21 0	5/31/21 2894					

June

Sun	Mon	Tue	Wed	Thu	Fri	Sat
–	–	6/1/21 11607	6/2/21 0	6/3/21 132	6/4/21 939	6/5/21 0
6/6/21 7134	6/7/21 42	6/8/21 912	6/9/21 0	6/10/21 1916	6/11/21 0	6/12/21 0
6/13/21 0	6/14/21 6000	6/15/21 1779	6/16/21 0	6/17/21 526	6/18/21 2658	6/19/21 0
6/20/21 1634	6/21/21 0	6/22/21 4935	6/23/21 0	6/24/21 1518	6/25/21 2176	6/26/21 1696
6/27/21 355	6/28/21 5545	6/29/21 0	6/30/21 1212			

July

Sun	Mon	Tue	Wed	Thu	Fri	Sat
–	–	–	–	7/1/21 0	7/2/21 1759	7/3/21 0
7/4/21 0	7/5/21 0	7/6/21 0	7/7/21 3888	7/8/21 114	7/9/21 0	7/10/21 0
7/11/21 625	7/12/21 0	7/13/21 6258	7/14/21 857	7/15/21 2351	7/16/21 0	7/17/21 0
7/18/21 0	7/19/21 2171	7/20/21 1197	7/21/21 2547	7/22/21 1137	7/23/21 0	7/24/21 0
7/25/21 0	7/26/21 6500	7/27/21 0	7/28/21 905	7/29/21 1008	7/30/21 3738	7/31/21 18615

August

Sun	Mon	Tue	Wed	Thu	Fri	Sat
8/1/21 0	8/2/21 0	8/3/21 0	8/4/21 0	8/5/21 111	8/6/21 3035	8/7/21 0
8/8/21 0	8/9/21 58	8/10/21 1634	8/11/21 4192	8/12/21 3000	8/13/21 0	8/14/21 0
8/15/21 0	8/16/21 412	8/17/21 222	8/18/21 54	8/19/21 1460	8/20/21 1750	8/21/21 0
8/22/21 5565	8/23/21 0	8/24/21 2124	8/25/21 699	8/26/21 0	8/27/21 777	8/28/21 0
8/29/21 3578	8/30/21 1576	8/31/21 525				

September

Sun	Mon	Tue	Wed	Thu	Fri	Sat
–	–	–	9/1/21 38	9/2/21 0	9/3/21 2672	9/4/21 0
9/5/21 0	9/6/21 0	9/7/21 943	9/8/21 2286	9/9/21 0	9/10/21 0	9/11/21 0
9/12/21 0	9/13/21 2987	9/14/21 288	9/15/21 -412	9/16/21 487	9/17/21 2100	9/18/21 0
9/19/21 0	9/20/21 0	9/21/21 2969	9/22/21 2250	9/23/21 0	9/24/21 0	9/25/21 0
9/26/21 0	9/27/21 0	9/28/21 2691	9/29/21 233	9/30/21 81		

October

Sun	Mon	Tue	Wed	Thu	Fri	Sat
–	–	–	–	–	10/1/21 0	10/2/21 0
10/3/21 0	10/4/21 0	10/5/21 2401	10/6/21 0	10/7/21 534	10/8/21 2050	10/9/21 0
10/10/21 0	10/11/21 0	10/12/21 3966	10/13/21 66	10/14/21 0	10/15/21 0	10/16/21 0
10/17/21 1861	10/18/21 0	10/19/21 3068	10/20/21 0	10/21/21 0	10/22/21 600	10/23/21 0
10/24/21 1000	10/25/21 0	10/26/21 1443	10/27/21 31	10/28/21 0	10/29/21 13	10/30/21 0
10/31/21 251						

November

Sun	Mon	Tue	Wed	Thu	Fri	Sat
–	11/1/21 2603	11/2/21 0	11/3/21 940	11/4/21 0	11/5/21 0	11/6/21 0
11/7/21 0	11/8/21 2850	11/9/21 0	11/10/21 0	11/11/21 0	11/12/21 0	11/13/21 0
11/14/21 0	11/15/21 4450	11/16/21 0	11/17/21 0	11/18/21 1694	11/19/21 101	11/20/21 0
11/21/21 0	11/22/21 0	11/23/21 0	11/24/21 3000	11/25/21 0	11/26/21 0	11/27/21 0
11/28/21 -925	11/29/21 429	11/30/21 3051				

December

Sun	Mon	Tue	Wed	Thu	Fri	Sat
–	–	–	12/1/21 0	12/2/21 0	12/3/21 0	12/4/21 0
12/5/21 0	12/6/21 0	12/7/21 4778	12/8/21 4014	12/9/21 903	12/10/21 0	12/11/21 0
12/12/21 0	12/13/21 6219	12/14/21 92	12/15/21 0	12/16/21 517	12/17/21 0	12/18/21 0
12/19/21 5005	12/20/21 0	12/21/21 0	12/22/21 2372	12/23/21 0	12/24/21 0	12/25/21 0
12/26/21 0	12/27/21 0	12/28/21 2584	12/29/21 852	12/30/21 1720	12/31/21 0	

Attachments

No attachments are listed.

Report Submitted/Certified on: 1/21/2022
By: Joseph LoSciuto

ATTACHMENT D

7/31/22 Monthly Checklist & 6/3/22 Weekly Inspection Form

BRISTOL ALLIANCE FUELS

VISUAL INSPECTION - MONTHLY CHECKLIST*

DATE: 7-31-22

INSPECTED BY: LB

	INSPECTED / OK (✓)	REQUIRES ATTENTION (attach comments)
TANK FARM, HEATING FUEL & DISPENSING TANKS, DRUMS		
EACH TANK (CONTAINER) INSPECTED FOR:		
• Visible signs of leakage, damage	✓	
• Signs of distortions, denting, bulging	✓	
• No severe corrosion - paint in good condition	✓ *	
• Foundations sound, no evidence of cracking, settlement or washout	✓	
• Tank valves – locked / good condition	✓	
• Tank level gauges – readable / good condition	✓	
• Level sensing devices – operate properly	✓	
• Tank vents – free of obstructions / operate properly	✓	
• All tank openings, manways properly sealed – bolts tight	✓	
• Tank roofs in good condition – no standing water, holes	✓	
• High level alarms tested – operate properly	✓	
• All tell-tale ringwall pipes checked – no evidence of fuel leaks	✓	
SECONDARY CONTAINMENT – DIKED IMPOUND		
• Diked areas impervious – retain stormwater – no oil sheen on water	✓	
• Retained water level acceptable (low)	✓	
• Containment area free of debris, fire hazards	✓	
• Dike walls, floor in good condition – no cracks, erosion	✓	
EXPOSED PIPING, MARINE HEADERS, HOSE REELS		
• Free of leakage, damage – good condition	✓	
• Supports, bollards - good condition	✓	
• Valves, flex connectors - good condition	✓	
• Pipe to soil penetrations - good condition, no corrosion	✓	
• Cargo line dike penetrations – impervious, seals in good condition	✓	
PUMPHOUSE & TRUCK RACK		
• Free of leakage, damage – good condition	✓	
• Piping, pumps, meters – good condition	✓	
• Hoses, nozzles, downspouts – good condition	✓	
• Drainlines, o/w separator – clean / good condition	✓	
SECURITY		
• Fences, gates – good condition – clear pathways / egress	✓	
• Locks on gates / tanks	✓	
• Warning signs in place	✓	
• Security lights operable	✓	
• Emergency notification signs posted	✓	
• Fire extinguishers in place	✓	
SURROUNDING AREA		
• General condition (housekeeping)	✓	
• Electrical wiring, control boxes, grounding lines – good condition	✓	
• Spill response equipment – inventory complete / equipment operable	✓	
• FRP / ODPCP, Ops. Manual, SPCC Plan in place	✓	

ADDITIONAL COMMENTS

OTHER CONDITIONS THAT SHOULD BE ADDRESSED FOR CONTINUED SAFE OPERATIONS

Section of paint on tk #4 missing "Paint ordered"

* In the event of severe weather (snow, ice, wind storms) or maintenance (such as painting) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required immediately following the event.

This checklist (or similar documentation) to be retained for 36 months to comply with Steel Tank Institute and API tank inspection standards and five years to comply with ADEC requirements.

BRISTOL ALLIANCE FUELS

STORAGE TANK / TANK FARM
SECONDARY CONTAINMENT AREA

WEEKLY INSPECTION FORM

DATE:	INSPECTED BY:	ITEMS LISTED BELOW * VISUALLY CHECKED:	COMMENTS IF NECESSARY
6-3-22	LB	All	Clean & Sight vegitation
6-10-22	LB	All	Clean & Slight vegiteton
6-17-22	LB	All	" " " "
6-24-22	LB	All	Clean & Slight vegiteton
7-1-22	LB	All	Clean & Slight vegiteton
7-15-22	LB	All	" " " "
7-22-22	LB	All	Clean & Slight Vegiteton
8-1-22	LB	All	Clean & Slight vegiteton

* ADEC regulations (18 AAC 75.075(c)) require facility personnel to conduct a documented weekly inspection of secondary containment areas for aboveground storage tanks, including checking for

(1) debris and vegetation;
(2) proper alignment and operations of drain valves;
(3) visible signs of oil leaks or spills;
(4) defects or failures of the secondary containment system.

This form is to be maintained in retrievable form for five years. (18 AAC 75.020(c))

ATTACHMENT E

Photograph Log

All photographs taken by Jon Klemesrud on August 15, 2022

Nikon Coolpix AW100

Photo Log – Bristol Bay Fuels – Dillingham Terminal

Photo #:01 (DSCN2665)
Description: Facing north, photo of the Facility's truck rack. A Facility truck was being filled via drop tube/downspout at the time of inspection.

Photo #:02 (DSCN2666)
Description: Facing east, photo of the truck rack. Blue piping is used for AV gas, red piping is used for gasoline, black is used for fuel oil / jet, green is used for #2 diesel.

Photo #:03 (DSCN2667)
Description: Facing south, photo from inside the pump room. The pumps are utilized to distribute stored fuel from the tank farm to the truck rack.

Photo #:04 (DSCN2668)
Description: Facing north, photo from within the tank farm.

Photo Log- Bristol Bay Fuels – Dillingham Terminal

Photo #:05 (DSCN2669)
Description: Facing west, photo of the tank gauge at Tank #2 within the tank farm.

Photo #:06 (DSCN2670)
Description: Facing west, photo of the tank gauge and water draw lines at Tank #2 within the tank farm.

Photo #:07 (DSCN2671
Description: Facing west, photo of the “cargo line” and “service line” at Tank #1 within the tank farm.

Photo #:08 (DSCN2672)
Description: Facing south, photo of Varec® pressure relief valve located on the top of Tank #1 within the tank farm.

Photo Log- Bristol Bay Fuels – Dillingham Terminal

Photo #:09 (DSCN2673)
Description: Facing southeast, photo of Varec® pressure relief valve located on the top of Tank #2 within the tank farm.

Photo #:10 (DSC2674)
Description: Facing south, photo of the “mid-line marine valves.”

Photo #:11 (DSCN2675)
Description: Facing west, photo of the truck rack.

Photo #:12 (DSCN2676)
Description: Facing southwest, photo of the marine cargo input equipment.

Photo Log – Bristol Bay Fuels – Dillingham Terminal

Photo #:13 (DSCN2677)
Description: Facing north, photo of the marine loading rack.

Photo #:14 (DSCN2678)
Description: Facing southwest, photo of a tanker truck that is part of the Facility's fleet. According to Mr. Byrne, a portion of the trucks are equipped to be filled via bottom-fill.

Photo #:15 (DSCN2679)
Description: Photo of a tanker truck that is part of the Facility's fleet. According to Mr. Byrne, a portion of the trucks equipped to be filled via bottom-fill.

Photo #:16 (DSCN680)
Description: Facing northeast, photo of two of the drop tubes/downspouts used at the truck loading rack.

ATTACHMENT F

Video Log

All videos taken by Jon Klemesrud on August 15, 2022

FLIR GF320 (w/24mm lens)

	Date	Time (24 Hr) (AKDT)	Location/Activity Description	Vapors Observed w/FLIR? (Y/N)[1]	Video Clip No.	Initials
Video #1	8/15/2022	10:10AM	Valves/service lines within the pump room	N	MOV_0872.mp4	JK
Video #2	8/15/2022	10:23AM	Tank #1 cargo and service line valves/seals	N	MOV_0873.mp4	JK
Video #3	8/15/2022	10:33AM	Tank #3 cargo and service line valves/seals	N	MOV_0874.mp4	JK
Video #4	8/15/2022	10:36AM	Tank #5 cargo and service line valves/seals	N	MOV_0875.mp4	JK
Video #5	8/15/2022	10:39AM	Tank #7 and Tank #8 cargo and service line valves/seals	N	MOV_0876.mp4	JK
Video #6	8/15/2022	10:49AM	Tank #1 pressure relief valve	Y	MOV_0877.mp4	JK
Video #7	8/15/2022	10:51AM	Tank #2 pressure relief valve	Y	MOV_0878.mp4	JK
Video #8	8/15/2022	10:54AM	Tank #4 pressure relief valve	Y	MOV_0879.mp4	JK
Video #9	8/15/2022	10:55AM	Tank #3 roof vent	Y	MOV_0880.mp4	JK
Video #10	8/15/2022	10:58AM	Tank #6 roof vent	Y	MOV_0881.mp4	JK
Video #11	8/15/2022	10:59AM	Tank #5 pressure relief valve	N	MOV_0882.mp4	JK
Video #12	8/15/2022	11:02AM	Tank #8 roof vent	Y	MOV_0883.mp4	JK
Video #13	8/15/2022	11:03AM	Tank #7 roof vent	N	MOV_0884.mp4	JK
Video #14	8/15/2022	11:22AM	Marine loading rack	N	MOV_0885.mp4	JK

[1]Yes (Y) indicates a visible plume of vapors was clearly observed with the FLIR camera. No (N) indicates vapors were not present or not clearly observed with the FLIR camera.

ATTACHMENT G

Post Inspection Correspondence

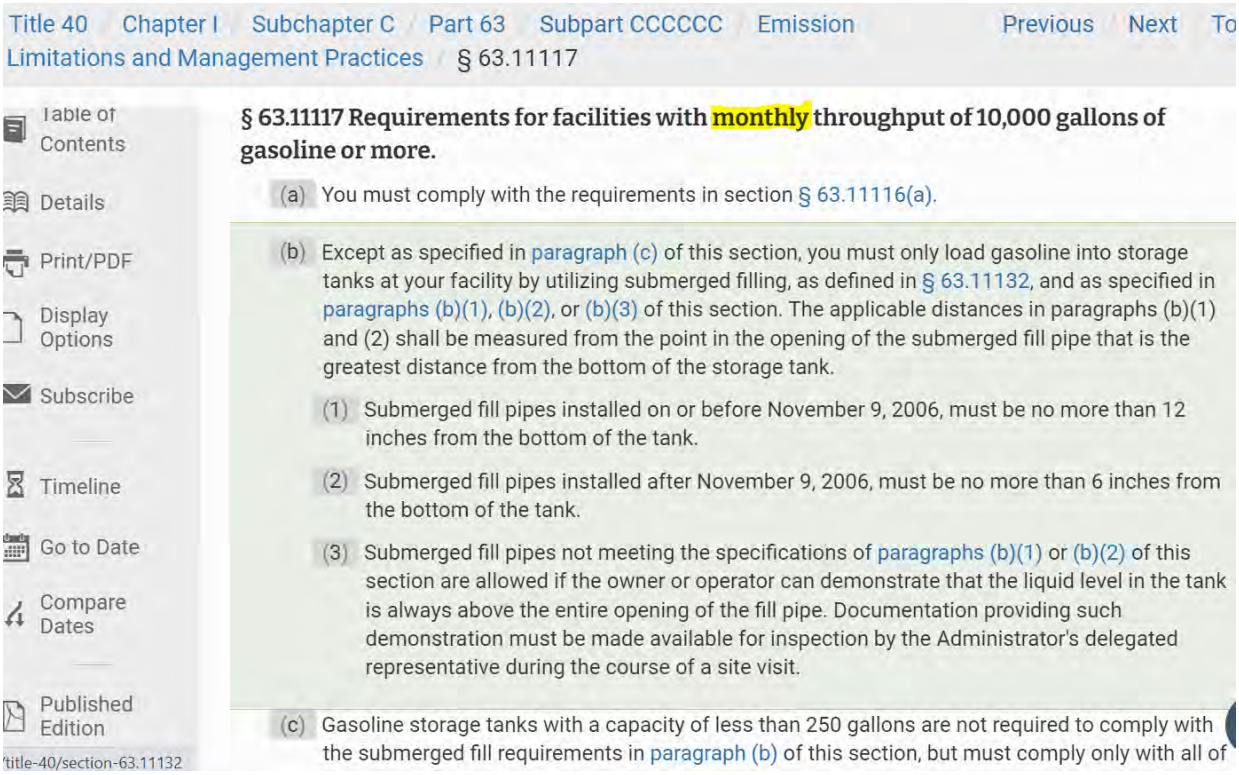
From: Klemesrud, Jon
To: Lewis Byrne
Cc: Hoover, Samantha M (DEC)
Subject: RE: BAF 2022 sales info to date
Date: Tuesday, August 16, 2022 3:41:00 PM
Attachments: image001.png
image002.png
image003.png

Received. Also glad we were able to connect via phone earlier this afternoon.

Once again, thank you for your time and assistance yesterday. I enjoyed my time on-site and really appreciated you setting the time aside to walk us through both BAF operations. As I review my notes further and compare to the applicable Clean Air Act regulations I will let you know of any potential compliance concerns that I would be documenting in my inspection report.

As discussed yesterday (and with the handouts provided), the inspection was focused on the regulations within the National Emission Standards for Hazardous Air Pollutants (NESHAP) Subpart BBBBBB (Gasoline Distribution Bulk Terminal, Bulk Plants and Pipeline Facilities) and Subpart CCCCCC (Gasoline Dispensing Facilities). We also briefly discussed Part 60, Subpart XX (Standards of Performance for Bulk Gasoline Terminals). Many of those requirements within the subparts are only required for "terminals" (greater than or equal to 20,000 gallons per day throughput).

One follow-up item I still need to discuss with some of my counterparts next week is the requirement of "submerged fill" within CCCCCC and how that relates to the tank filling procedures observed and discussed at the truck rack. See referenced language below and I'll make sure to follow-up with you after I have those discussions.



Title 40 Chapter I Subchapter C Part 63 Subpart CCCCCC Emission Limitations and Management Practices § 63.11117 Previous Next To

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'title-40/section-63.11132

§ 63.11117 Requirements for facilities with monthly throughput of 10,000 gallons of gasoline or more.

(a) You must comply with the requirements in section § 63.11116(a).

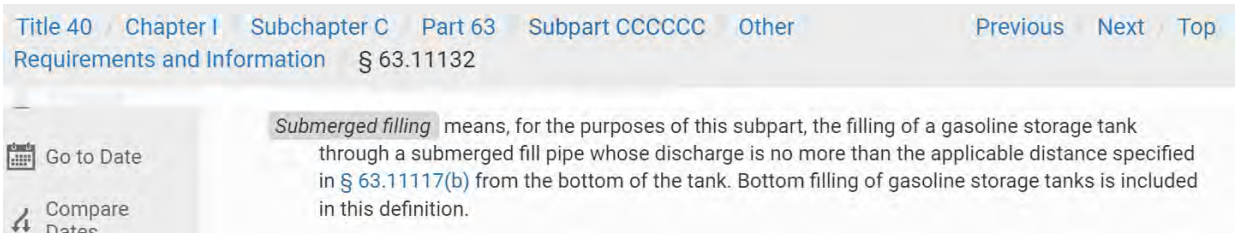
(b) Except as specified in paragraph (c) of this section, you must only load gasoline into storage tanks at your facility by utilizing submerged filling, as defined in § 63.11132, and as specified in paragraphs (b)(1), (b)(2), or (b)(3) of this section. The applicable distances in paragraphs (b)(1) and (2) shall be measured from the point in the opening of the submerged fill pipe that is the greatest distance from the bottom of the storage tank.

(1) Submerged fill pipes installed on or before November 9, 2006, must be no more than 12 inches from the bottom of the tank.

(2) Submerged fill pipes installed after November 9, 2006, must be no more than 6 inches from the bottom of the tank.

(3) Submerged fill pipes not meeting the specifications of paragraphs (b)(1) or (b)(2) of this section are allowed if the owner or operator can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by the Administrator's delegated representative during the course of a site visit.

(c) Gasoline storage tanks with a capacity of less than 250 gallons are not required to comply with the submerged fill requirements in paragraph (b) of this section, but must comply only with all of



Jon Klemesrud
Field, Data, & Drinking Water Enforcement Section
Enforcement & Compliance Assurance Division (M/S 20-C04)
U.S. Environmental Protection Agency, Region 10
(206) 553-5068

From: Lewis Byrne <LewisB@bristolbayfuels.com>
Sent: Tuesday, August 16, 2022 9:09 AM
To: Klemesrud, Jon <Klemesrud.Jon@epa.gov>
Subject: BAF 2022 sales info to date

Morning Jon
Please give me a call I have a couple questions for you, here is our data to date .

BAF DLG
AQ1578PL101P-PL1-2022

-

Day	
01/01/2022	0
01/02/2022	0
01/03/2022	0
01/04/2022	0
01/05/2022	0
01/06/2022	244
01/07/2022	2,600
01/08/2022	0
01/09/2022	388
01/10/2022	0
01/11/2022	2,155
01/12/2022	476
01/13/2022	0
01/14/2022	84
01/15/2022	0
01/16/2022	0
01/17/2022	3,425
01/18/2022	0
01/19/2022	23
01/20/2022	0
01/21/2022	2,800
01/22/2022	0
01/23/2022	0
01/24/2022	0
01/25/2022	153
01/26/2022	0
01/27/2022	129

01/28/2022	5
01/29/2022	0
01/30/2022	958
01/31/2022	4,777
02/01/2022	0
02/02/2022	0
02/03/2022	0
02/04/2022	0
02/05/2022	1,678
02/06/2022	0
02/07/2022	0
02/08/2022	129
02/09/2022	2,865
02/10/2022	0
02/11/2022	2,700
02/12/2022	0
02/13/2022	0
02/14/2022	0
02/15/2022	0
02/16/2022	2,800
02/17/2022	0
02/18/2022	97
02/19/2022	0
02/20/2022	0
02/21/2022	0
02/22/2022	1,483
02/23/2022	0
02/24/2022	2,300
02/25/2022	600
02/26/2022	0
02/27/2022	0
02/28/2022	576
03/01/2022	0
03/02/2022	0
03/03/2022	2,384
03/04/2022	1,283
03/05/2022	0
03/06/2022	0
03/07/2022	0
03/08/2022	0
03/09/2022	2,997
03/10/2022	0
03/11/2022	1,832
03/12/2022	0
03/13/2022	3,135
03/14/2022	928
03/15/2022	1,700
03/16/2022	564
03/17/2022	113
03/18/2022	1,750
03/19/2022	0
03/20/2022	0
03/21/2022	0
03/22/2022	0
03/23/2022	2,158
03/24/2022	3
03/25/2022	1,300
03/26/2022	0
03/27/2022	800
03/28/2022	0
03/29/2022	256
03/30/2022	0
03/31/2022	402
04/01/2022	2,732
04/02/2022	0
04/03/2022	0

04/04/2022	0
04/05/2022	0
04/06/2022	500
04/07/2022	2,919
04/08/2022	0
04/09/2022	0
04/10/2022	251
04/11/2022	0
04/12/2022	877
04/13/2022	3,038
04/14/2022	0
04/15/2022	1,900
04/16/2022	0
04/17/2022	1,000
04/18/2022	0
04/19/2022	72
04/20/2022	0
04/21/2022	0
04/22/2022	2,990
04/23/2022	0
04/24/2022	0
04/25/2022	694
04/26/2022	0
04/27/2022	2,914
04/28/2022	0
04/29/2022	361
04/30/2022	0
05/01/2022	0
05/02/2022	0
05/03/2022	0
05/04/2022	288
05/05/2022	2,977
05/06/2022	998
05/07/2022	0
05/08/2022	912
05/09/2022	1,111
05/10/2022	0
05/11/2022	3,028
05/12/2022	268
05/13/2022	1,700
05/14/2022	0
05/15/2022	0
05/16/2022	4,518
05/17/2022	2,649
05/18/2022	843
05/19/2022	385
05/20/2022	0
05/21/2022	0
05/22/2022	0
05/23/2022	2,495
05/24/2022	1,431
05/25/2022	0
05/26/2022	3,705
05/27/2022	3,495
05/28/2022	0
05/29/2022	0
05/30/2022	89
05/31/2022	2,685
06/01/2022	1,700
06/02/2022	0
06/03/2022	0
06/04/2022	0
06/05/2022	0
06/06/2022	4,086
06/07/2022	0
06/08/2022	5,852

06/09/2022	4,373
06/10/2022	65
06/11/2022	0
06/12/2022	2,799
06/13/2022	1,938
06/14/2022	296
06/15/2022	0
06/16/2022	5,710
06/17/2022	3,034
06/18/2022	0
06/19/2022	300
06/20/2022	3,059
06/21/2022	657
06/22/2022	4,255
06/23/2022	0
06/24/2022	2,950
06/25/2022	0
06/26/2022	0
06/27/2022	2,137
06/28/2022	4,146
06/29/2022	0
06/30/2022	14,906
07/01/2022	2,600
07/02/2022	0
07/03/2022	0
07/04/2022	1,865
07/05/2022	3,022
07/06/2022	0
07/07/2022	781
07/08/2022	3,310
07/09/2022	0
07/10/2022	0
07/11/2022	4,661
07/12/2022	4,839
07/13/2022	1,499
07/14/2022	1,557
07/15/2022	5,980
07/16/2022	701
07/17/2022	0
07/18/2022	2,850
07/19/2022	0
07/20/2022	233
07/21/2022	1,741
07/22/2022	3,038
07/23/2022	0
07/24/2022	0
07/25/2022	0
07/26/2022	3,340
07/27/2022	0
07/28/2022	3,043
07/29/2022	2,344
07/30/2022	1,209
07/31/2022	13,290

BRISTOL BAY FUELS

Best Regards
Lewis Byrne

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Director of Fuels and Terminals
Lewisb@bristolbayfuels.com
C 907-252-7625